UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
999 18TH STREET - SUITE 300
DENVER, CO 80202-2466
Phone 800-227-8917
http://www.epa.gov/region08

Ref 8EPR-SR January 9, 2003

MEMORANDUM

SUBJECT Review of the Vasquez Boulevard/Interstate 70 Site by the National Remedy Review Board

FROM Dale Vodehnal, Director
Superfund Program
EPA Region VIII

TO National Remedy Review Board

Attached is the site information package for Operable Unit 1 of the Vasquez Boulevard/Interstate 70 (VB/I-70) Superfund Site, Denver, Colorado, EPA Region VIII The Site Identification number is CO0002259588

The following summary information may assist you in your review of the attached materials

The VB/I-70 Site was listed on the National Priorities List in July, 1999 The remedial investigation began in September 1998 The final Remedial Investigation Report was completed in July 2001 A final Baseline Human Health Risk Assessment was completed in August 2001 An initial feasibility study was completed in November 2001

In the initial feasibility study, 5 remedial alternatives were developed and evaluated against the nine criteria in the National Contingency Plan Based on this analysis, EPA and the Colorado Department of Public Health and Environment (CDPHE) identified "Alternative 4" (described in the attached information package) as the preferred alternative, giving substantial consideration to the criterion, State Acceptance In May, 2002, EPA issued a proposed plan that summarized the evaluation of alternatives, identified Alternative 4 as the preferred alternative, and requested public comment

A 60-day public comment period followed the release of the proposed plan The public provided extensive comments on EPA's and CDPHE's preferred alternative Many who provided comments expressed concern that under Alternative 4, soil with lead levels above EPA OSWER's

screening level for lead in soil of 400 mg/Kg would not be removed and replaced Some suggested that EPA would not be following its own regulations under the Toxic Substances and Control Act unless soil was removed from properties where lead levels exceed 400 mg/Kg Some who provided comments asked EPA for an explanation of the difference between the proposed arsenic action level for soil at VB/I-70 and those proposed at other Superfund sites

Region VIII responded to public comments on the May 2002 proposed plan by developing and evaluating a new alternative, Alternative 6, that would require soil removal and replacement at yards where arsenic is greater than 70 mg/Kg or lead is greater than 400 mg/Kg

Region VIII prepared an addendum to the Feasibility Study Report that develops and evaluates the new alternative, Alternative 6 EPA selected Alternative 6 as the new preferred alternative Alternative 6 consists of the following components

- Implementation of a community health program

The community health program alternative for the VBI70 site would be composed of two separate (but partially overlapping) elements

Public Health Program to Reduce Risks from Lead The program for reduction of lead risks is intended to be general That is, it is intended to assess risks from lead from any and all potential sources of exposure, with response actions tailored to address the different types of exposure source that may be identified The lead program will consist of three main elements

1 Community and individual education about potential pathways of exposure to lead, and the potential health consequences of excessive lead exposure

2 A biomonitoring program by which any child (up to 72 months old) may be tested to evaluate actual exposure

3 A program that provides a response to any observed lead exposure that is outside the normal range This will include any necessary follow-up sampling, analysis, and investigation at a child's home to help identify the likely source of exposure, and to implement an appropriate response that will help reduce the exposure

A key component of the response program is that all potential sources of lead at a property would be sampled, including soil and interior/exterior paint If soil is judged to be the most likely source of exposure, a series of alternative actions will be evaluated to identify the most effective way to reduce that exposure These will include a wide range of potential alternatives, including such things as education, sodding or capping of contaminated soil, tilling/treatment, etc If exterior paint is the source of lead contamination in soil, remediation of the paint may be considered If the main source is judged to be non-soil related, responses may include things such as education and counseling, or referral to environmental sampling/response programs offered by other agencies, as appropriate

Public Health Program to Reduce Risks from Pica Ingestion of Arsenic The public health program for arsenic is designed to focus specifically on the potential risks to young children from pica behavior The program for arsenic will consist of three main elements

1 Community and individual education about identification and potential hazards of pica behavior and the potential health consequences of excessive acute oral exposure to arsenic

2 A biomonitoring program by which any child may be tested to evaluate actual soil pica exposure to arsenic

3 A program that provides a response to any observed inorganic arsenic exposures that are outside the normal range This will include any necessary follow-up sampling, analysis, and investigation at a child's home to help identify the likely source of exposure, and to implement an appropriate response that will help reduce the exposure

Alternative 6 also includes an extensive soil removal and replacement program

- In yards where arsenic is greater than 70 mg/Kg or lead is greater than 400 mg/Kg, accessible soils would be removed to a depth of 12 inches and transported offsite for disposal at an appropriate facility The excavation areas would be backfilled with clean soil containing arsenic and lead concentrations at or below preliminary remediation goals, and pre-remediation yard features restored EPA estimates that soil removal and replacement would occur at a total of 853 residential properties within the entire site (508 properties for arsenic only, 108 properties for both lead and arsenic and 237 for lead only)

- To date, EPA has sampled the soil at approximately 75% of the residential properties within the VBI70 site boundary EPA will provide a program of on-going testing for lead and arsenic in soil at any residential property within the site boundaries that has not already been adequately tested If lead exceeds 400 mg/Kg or arsenic exceeds 70 mg/Kg, soil would be removed and disposed offsite This sampling program will operate for as long as on-site construction of the remedy is occurring

The estimated net present worth cost of Alternative is $31 1 million at a discount rate of 5%

The enclosed information package includes statements of support for Alternative 6 as the preferred alternative from the community group who received a Technical Assistance Grant (Appendix J) and from CDPHE (Appendix M) A statement from the potentially responsible party is also included (Appendix K) A copy of all public comments received on the May, 2002 proposed plan is included as Appendix L

After the national remedy review board reviews Region VIII's preferred alternative for the VB/I-70 Site OU-1, EPA Region VIII will respond to the board's recommendations and then issue a new proposed plan for public comment

Region VIII is looking forward to the February 5, 2003 meeting of the board here in Denver Please use site account number 2003T08L50102D089RCO01 for your travel funding If you have any questions, please call me at (303)312-6761